

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

ELIZABETH CROOKS

Plaintiff

Civil No. 1:19-CV-00547

VS.

SHELTER MUTUAL INS. CO.

Defendant

Judge Drell

Magistrate Judge Perez-Montes

**PROPOSED PLAN OF WORK**

On June 26, 2019, the following individuals participated in a meeting by telephone/other electronic means, during which this Plan of Work was formulated: (List all parties and their counsel, if any, *including e-mail addresses for trial attorneys.*)

**Shawn M. Bordelon** of Laborde Earles Law Firm, LLC, on behalf of Plaintiff, Elizabeth Crooks  
Email: shawn@onmyside.com

**Andrew E. Schaffer** of Johnson, Siebeneicher & Ingram, Inc., on behalf of Defendant, Shelter Mutual Insurance Company  
Email: AndySchaffer@jslawfirm.com

**Part A**

Based on the information now reasonably available, the parties have agreed upon the following:

1. 04/17/2020 Deadline for completion of discovery
2. 08/14/2020 Final date for filing dispositive motions
3. 01/24/2020 Final date for adding parties
4. 01/24/2020 Final date for filing amended pleadings
5. 01/17/2020 Final date for Plaintiff's disclosing of experts
6. 02/17/2020 Final date for Defendant's disclosing of experts
7. 03/17/2020 Final date for Plaintiff's expert reports
8. 04/17/2020 Final date for Defendant's expert reports
9. 06/17/2020 Final date for taking depositions of experts

10. 07/31/2019 Date disclosures under Fed. R. Civ. P. 26(a) were made or will be made
11. Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters: NONE.

**Part B**

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: NONE.

Respectfully Submitted:

**LABORDE EARLES LAW FIRM, LLC.**

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**ATTORNEYS FOR PLAINTIFF,**  
**ELIZABETH CROOKS**

**JOHNSON, SIEBENEICHER & INGRAM, INC.**

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**ATTORNEYS FOR DEFENDANT,**  
**SHELTER MUTUAL INS. CO.**

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**ORDER**

Considering the Proposed Plan of Work submitted herein,

IT IS ORDERED that the Plan of Work be and is hereby accepted and shall become the Scheduling Order in this case, subject to the following modifications:

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It appearing to the Court that the provisions of the Plan of Work will be satisfied on \_\_\_\_\_, 20\_\_\_\_,

IT IS FURTHER ORDERED that a pretrial conference be held, in Chambers, on \_\_\_\_\_, 20\_\_\_\_, beginning at \_\_\_\_:\_\_\_\_ \_\_.M.

IT IS FURTHER ORDERED that the Clerk of court send out the Civil Case Management Order No. 2 – Pretrial Proceedings.

IT IS FURTHER ORDERED that counsel are to review this Court's Standing Order – Possession and Use of Electronic Devices in the Courtroom found on our website at [www.lawd.uscourts.gov](http://www.lawd.uscourts.gov) on Judge Dee D. Drell's forms page.

SIGNED on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at Alexandria, Louisiana.

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DEE D. DRELL, JUDGE  
UNITED STATES DISTRICT COURT